

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 16-mj-58

ADRIAN JAIMES,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE,
SECTION 2251(a)

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

On or about August 10, 2015, in the Western District of Wisconsin, the defendant,

ADRIAN JAIMES,

knowingly and intentionally used and persuaded KV #1, a minor male born in May 2005, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and such visual depictions were transmitted using any means or facility of interstate commerce, specifically, visual depictions of the lascivious exhibition of the genitals and pubic area of KV #1 were transmitted via the internet.

(In violation of Title 18, United States Code, Section 2251(a)).


SUSAN J. JENSEN
Special Agent
Homeland Security Investigations

Sworn to before me this 10th day of June 2016.


STEPHEN L. CROCKER
United States Magistrate Judge

AFFIDAVIT

STATE OF WISCONSIN)
) ss.
DANE COUNTY)

I, Susan J. Jensen, being duly sworn, depose and state as follow:

1. I am a Special Agent (SA) with the U.S. Immigration and Customs Enforcement, Homeland Security Investigations (HSI), an investigative branch of the U.S. Department of Homeland Security. I have been so employed since February 2006. I am currently assigned to the Office of the Special Agent in Charge in Oakbrook Terrace, Illinois. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. As part of my duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of Title 18, United States Code, Sections 2251 and 2252. I have received training in the investigation of child pornography and child exploitation offenses, and have had the opportunity to observe and review numerous examples of electronically-stored child pornography (as defined in 18 U.S.C. § 2256).

2. Most of the information contained in this affidavit is either personally known to me or has been related to me by other law enforcement agents. Since this affidavit is being submitted for the limited purpose of obtaining a complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are

necessary to establish probable cause to believe that defendant has violated Title 18, United States Code, Sections 2251 and 2252.

3. On October 4, 2015, law enforcement was contacted by the mother of an 11-year old boy, referred to in this affidavit as Known Victim #1 (KV #1). The mother reported that KV #1 had been using the Kik Application on his iPad to communicate with and to send naked pictures of himself to someone with the user name "Adrianjaimes_Hey World" (hereinafter referred to Adrianjaimes). From the conversation, it appeared the pictures were taken and sent at the request of Adrianjaimes.


4. Law enforcement took custody of the iPad and forensically analyzed it. Through the analysis, they were able to determine that KV #1 also had been communicating with and took and sent nude photographs to someone with the user name "pondwater83 Hey There" (hereinafter referred to as pondwater83) at the user's request.

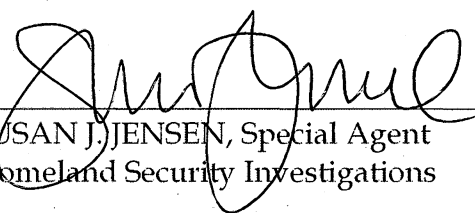
5. KV #1 was interviewed as part of the investigation. He said that he "met" Adrianjaimes and pondwater83 on Kik. He believed Adrianjaimes was a male of unknown age, and that pondwater83 was his sister. He also said that both Adrianjaimes and pondwater83 asked him to take naked pictures and videos of himself and send the images to them. At times, he complied but said he was uneasy doing so.

6. I have reviewed the chats between KV #1 and Adrianjaimes and pondwater 83 and the images associated with them. I recognize the child in the images and videos as KV #1, from observing a recording of his forensic interview.

7. On August 10, 2015, the user pondwater83 asked KV#1 to send "nudes" and "full body nudes." After some additional discussion, KV #1 sent pondwater83 a picture of himself wearing boxer shorts. Pondwater83 then asked KV #1 to lower his underwear. Following additional exchanges and requests by Pondwater83, KV#1 sent Pondwater83 a picture of himself with his arms down by his sides. His penis is exposed to the camera and appears to be the focus of the image.

8. Later that same day, pondwater83 asked KV #1 to send a video of himself "showing off your body and stuff. And make it like a minute long." After additional discussion, with pondwater83 saying "You'd make me the happiest girl right now if you did ☺," KV#1 sent pondwater83 a 23 second video of himself from the neck down to just below his knees. He is shown in front of the camera and turns to the side. He does not have any clothes on and his genital region is the focus of the video.

 9. On June 9, 2016, I participated in the execution of a search warrant of Jaimes' home. Jaimes was interviewed at the scene and admitted to using the user names Adrianjaimes and pondwater83. He also admitted to communicating with KV#1, sending adult pornography to KV #1, and asking KV#1 to send naked pictures to Jaimes.


SUSAN J. JENSEN, Special Agent
Homeland Security Investigations

Sworn to before me this 10th day of June 2016.


STEPHEN L. CROCKER
United States Magistrate Judge